



**BOULT • CUMMINGS
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February 25, 2002

OFFICE OF THE
EXECUTIVE SECRETARY

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Petition of MCI WorldCom to Enforce Interconnection Agreement with
BellSouth Telecommunications, Inc.
Docket No. 01-00513

Dear David:

MCI WorldCom is in receipt of BellSouth's February 19, 2002 request for additional time and proposal to provide substitute data in response to the TRA's February 11, 2002 Data Requests. As an initial matter, MCI WorldCom stands ready on behalf of Brooks Fiber to provide a complete response to the TRA's February 11, 2002 Data Request. Unlike BellSouth, MCI WorldCom maintains complete call records and stands ready to provide that information to the Staff, in the form requested by the Staff, by February 25, 2002.

Furthermore, MCI WorldCom would dispute the claim by BellSouth that extracting the information from "raw AMA data" in the manner requested by the TRA would entail "a manual effort at best requiring literally thousands of hours". While it took some effort, MCI WorldCom was able to extract and provide the requested historical information from its AMA data by utilizing elementary database commands that are available in any database development platform.

The inability of BellSouth to provide the data to the TRA to support its case illustrates the problem that MCI WorldCom has experienced and presented to the TRA in the hearings in this case. Despite repeated attempts over the course of some four years to obtain data from BellSouth to support its purported disputes regarding billed usage, BellSouth was never able to provide the data and yet continued (and continues to this day) to withhold substantial sums of dollars on the basis of these alleged usage disputes.

Instead of providing the TRA with the billing records that would support (or not support) BellSouth's claims, BellSouth proposes instead to provide the results of a one-day test of current data. That is hardly a substitute, for actual historical data. The issue in the case is the historic usage billings by MCI WorldCom over a four year period. A single day comparison of call detail records would provide no evidence as to the validity of the BellSouth monthly traffic summary reports on which BellSouth based its decisions to withhold millions of dollars from MCI WorldCom. BellSouth has represented to the TRA that its measurement of usage over the

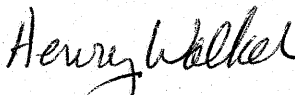

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past four years is more accurate than the usage measured and billed by MCI WorldCom, but BellSouth has no billing records to support those representations. MCI WorldCom, in contrast, keeps billing records developed from the AMA data extracted contemporaneously from its terminating switch records. MCI WorldCom is able to extract that historic usage information today and provide it to the TRA in the format requested.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker 

HW/nl

c: Guy Hicks, Esq.